

John Neil Stephenson (SBN 12497)  
STEPHENSON LAW, PLLC  
1770 Verdi Vista Court  
Reno, Nevada 89523  
T: 510-502-2347  
E: johnstephensonlaw@gmail.com  
W: stephensonfirm.com  
*Counsel for Defendant Hacienda Rooming House, Inc.  
dba Bella's Hacienda Ranch*

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA (RENO)**

**JANE DOE;**

**Plaintiff,**

**v.**

**JOSEPH LOMBARDO, Governor of  
Nevada, in his official capacity; AARON  
FORD, Attorney General of Nevada, in his  
official capacity; NYE COUNTY; ELKO  
COUNTY; STOREY COUNTY; WESTERN  
BEST, INC. D/B/A CHICKEN RANCH;  
WESTERN BEST, LLC; DESERT ROSE  
CLUB, LLC; HACIENDA ROOMING  
HOUSE, INC. D/B/A BELLA'S HACIENDA  
RANCH; MUSTANG RANCH  
PRODUCTIONS, LLC d/b/a MUSTANG  
RANCH LOUNGE, LLC; LEONARD  
"LANCE" GILMAN, in his  
official capacity; and LEONARD "LANCE"  
GILMAN, in his individual capacity,**

**Defendants.**

**Case No. 3:24-cv-00065-MMD-CSD**

**DEFENDANT HACIENDA ROOMING  
HOUSE, INC. D/B/A BELLA'S  
HACIENDA RANCH'S RESPONSE TO  
PLAINTIFF'S REQUEST FOR ENTRY  
OF DEFAULT [#113] AND  
DECLARATION OF BELLA  
CUMMINS IN SUPPORT THEREOF**

///

///

///

**MEMORANDUM OF POINTS AND AUTHORITIES**

Plaintiff Jane Doe has filed a request for entry of default [#113]. Defendant Hacienda Rooming House, Inc. d/b/a Bella's Hacienda Ranch ("Bellas") hereby responds and requests that it be denied.

Bellas has not been properly served in this matter; accordingly, the deadline for it to respond to Plaintiff's Complaint has not yet been triggered. The proof of service attached to the summons and complaint shows that they were served on Letrice Torres [#57, p. 2]. Ms. Torres does not have authority to accept service on behalf of Bellas. Declaration of Bella Shauna Cummins, ¶3. The registered agent for Bellas, as can be seen from the Nevada Secretary of State's website, is Bella Shauna Cummins. *Id.* at ¶4, Exhibit 1. Ms. Cummins, alone, has the authority to accept service on behalf of Bellas. *Id.* at ¶4. Ms. Cummins has not been served with process. *Id.* at ¶5. Plaintiff's motion must therefore be denied.

If, the Court concludes that service is somehow proper, Bellas requests that it be given twenty (21) days from any Order thereon to file a responsive pleading.

DATED: September 16, 2024

STEPHENSON LAW, PLLC

*John Neil Stephenson*

By: John Neil Stephenson

Its: Managing Member

*Counsel for Defendant Hacienda Rooming  
House, Inc. dba Bella's Hacienda Ranch*

**CERTIFICATE OF SERVICE**

I hereby certify that I electronically filed the foregoing, DEFENDANT HACIENDA ROOMING HOUSE, INC. D/B/A BELLA'S HACIENDA RANCH'S RESPONSE TO PLAINTIFF'S REQUEST FOR ENTRY OF DEFAULT [#113] by using the CM/ECF system on the date indicated below. To the best of my knowledge and belief, I certify that participants in the case are registered electronic filing system users and will be served via this Court's CM/ECF system.

DATED: September 16, 2024

STEPHENSON LAW, PLLC

*John Neil Stephenson*

By: John Neil Stephenson

Its: Managing Member

*Counsel for Defendant Hacienda Rooming  
House, Inc. dba Bella's Hacienda Ranch*